Declaration of J.F.L.

I, J.F.L., declare as follows under penalty of perjury:

- My name is J.F.L. I submit this declaration in support of Plaintiffs' motions for leave to certify a class. I am seeking to be a lead plaintiff in this case and understand the responsibilities involved.
- 2. I have spoken with my attorneys about being a lead plaintiff in a class action and what that means. I understand that I need to know what is going on with the case and any possible agreements we might come to.
- 3. I also understand that I will be part of a team making important legal decisions and directing the attorneys in this case after getting their advice. In order to do this, I can look at the legal documents and get updates from my attorneys on what is going on with everything submitted to the court, as well as answer questions from the opposing attorneys on paper and in person. I will share what I think about decisions and be involved in any final approval of major legal decisions, including whether to settle this case and how to do that.
- 4. My attorneys have explained to me that I have a responsibilty to the whole Class to protect our interests and those of other immigrants like me. I know that to do this properly I have to help bring this case forward on the behalf of the whole Class. I will do my best to get the best result for the Class.
- 5. I will be an active participant in this case, directing my attorneys and making sure things get done efficiently.
- 6. I will communicate on a regular basis with my attorneys about important motions, settlement talks, trial preparations, and trial. I know I have the responsibility to direct my

- attorneys on each of those things after getting their advice. I will speak with my attorneys as often as is necessary.
- 7. I will work with the other Lead Plaintiffs on this case to make decisions when issues come up about how to proceed. If we disagree, we will take a vote and I will accept whatever the majority agrees is the best thing to do.
- 8. I understand that my attorneys have a responsibility to every member of the proposed Class to provide fair and adequate representation.
- 9. I believe that Public Counsel, Manatt, Phelps & Phillips, LLP, and Lawyers' Committee for Civil Rights should be approved by the Court to serve as Co-Lead Counsel for the Class. I believe they will work hard to obtain the best result for the Class.

I respectfully request that the Court grant the relief sought by Plaintiffs. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on November 15, 2018, at Los Angeles, California.

J.F.L.